

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI
AT HANNIBAL**

**HANNIBAL-LAGRANGE UNIVERSITY,
PLAINTIFF,
vs.
LINDA MCMAHON, ET AL.
DEFENDANTS.**

CASE No. 2:25-CV-00042-HEA

**PLAINTIFF’S MOTION TO FILE OVERLENGTH SUGGESTIONS IN SUPPORT OF ITS
MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Local Rule 4.01(D) and Federal Rule of Civil Procedure 7(b), Plaintiff Hannibal-LaGrange University (“HLGU”) respectfully moves for leave to file an over-length memorandum in support of its contemporaneously filed motion for preliminary injunction.

In support, HLGU states:

1. Local Rule 4.01(D) generally limits any motion, memorandum, or brief to fifteen (15) numbered pages unless the Court grants prior leave.

2. Plaintiff’s preliminary injunction brief addresses weighty constitutional and statutory claims, including violations of the First Amendment, the Religious Freedom Restoration Act, and the Higher Education Act. Resolving these issues will require careful exposition of complex statutory and regulatory frameworks, as well as controlling Supreme Court and Eighth Circuit precedent.

3. HLGU therefore requests permission to file a memorandum not to exceed twenty-four (24) numbered pages, exclusive of the table of contents, table of authorities, signature block, and exhibits. A copy of the proposed brief is attached as Exhibit 1. This length is the minimum necessary to present the record, articulate the legal standards, and apply those standards to the facts without sacrificing clarity.

4. Good cause exists, because the brief involves constitutional principles of church autonomy and free exercise that bear directly on HLGU's ability to govern itself in accordance with Baptist doctrine. Moreover, the challenged regulation is both novel and intricate, requiring detailed statutory analysis and comparison with other federal oversight mechanisms. Further, an undersized brief would impede the Court's full consideration of the merits at this critical, time-sensitive stage.

5. As of the filing of this motion, no attorney has yet been assigned to defend the Department. Accordingly, undersigned counsel has been unable to obtain their position but will promptly notify the US Attorney and attorneys for the Department, providing them with an opportunity to respond.

6. Granting this motion will not prejudice Defendants; Plaintiff consents to a reciprocal overlength brief, should Defendants' desire.

WHEREFORE, Plaintiff Hannibal-LaGrange University respectfully asks the Court to grant leave to file a memorandum in support of its Motion for Preliminary Injunction of up to twenty-four (24) pages and for such further relief as the Court deems just.

Respectfully Submitted,

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ATTORNEY FOR PLAINTIFF HANNIBAL
LAGRANGE UNIVERSITY

CERTIFICATE OF SERVICE

I hereby certify that on July 14 2025, I electronically filed the above with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

Date: July 14, 2025.

s/Jonathan R. Whitehead

AN ATTORNEY FOR PLAINTIFF HANNIBAL
LAGRANGE UNIVERSITY